

**LORING JACOBS  
IN PRO PER**

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*for Defendant:*

LORING JACOBS

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

TACSIS APC, a California Corporation;  
and KENT LIMSON, an individual,

Plaintiffs

v.

JACKIE ROBINSON, an individual; ALL  
NET LAND DEVELOPMENT, LLC, a  
Nevada Limited Liability Company; ALL  
NET, LLC, a Nevada Limited Liability  
Company; DRIBBLE DUNK, LLC, a  
Nevada Limited Liability Company; AGS  
ASSURETY, LLC, a Nevada Limited  
Liability Company; TIMOTHY J.  
ARELLANO, an individual; DAVID  
LOWDEN, an individual; MESSNER  
REEVES LLP, a Colorado Limited  
Liability Partnership; TORBEN WELCH,  
an individual; LORING JACOBS, an  
individual, and DOES 1 THROUGH 100  
INCLUSIVE,

DEFENDANTS.

CASE NO.: **2:2024-cv-02284**

**MOTION FOR CONTINUANCE**

COMES NOW INDIVIDUAL DEFENDANT LORING JACOBS (“DEFENDANT”) AND  
HEREBY MOVES THIS COURT FOR A CONTINUANCE OF THIRTY (30) DAYS OF ALL  
CURRENT DEADLINES IN THIS CASE, PURSUANT TO RULE 6(B)(1) OF THE

MOTION FOR CONTINUANCE

1 FEDERAL RULES OF CIVIL PROCEDURE, AND IN SUPPORT THEREOF STATE AS  
2 FOLLOWS:

- 3
- 4 1. **Counsel Retention:** Defendant is in the process of retaining Gary S. Lincenberg of Bird,  
5 Marella, Rhow, Lincenberg, Dooks & Nessim, LLP, located at 1875 Century Park East,  
6 23rd Floor, Los Angeles, California 90067-2561, as his legal counsel. Mr. Lincenberg's  
7 contact details are as follows: phone (310) 201-2100, email  
8 glincenberg@birdmarella.com, website www.birdmarella.com.
- 9
- 10 2. **Circumstances Necessitating Continuance:** Defendant Jacobs is attempting to retain  
11 Mr. Lincenberg and Mr. Bird of Bird Marella. Both Mr. Lincenberg and Mr. Bird  
12 suffered losses in the Palisades fire. So, Defendant is requesting additional time.
- 13
- 14 3. **Good Cause for Continuance:** Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure  
15 provides that a court may, for good cause, extend deadlines if a request is made before  
16 the expiration of the original deadline.
- 17
- 18 4. **Equity and Justice Favor the Granting of This Motion:** A continuance will not  
19 prejudice the Plaintiffs or the progression of this case. Instead, it will ensure that the  
20 Defendants' newly retained counsel can adequately prepare, review the case materials,  
21 and address this matter thoroughly.
- 22
- 23 5. **Requested Relief:** In light of the aforementioned circumstances and the principles of  
24 fairness and equity, the Defendant respectfully requests a 30-day continuance of all  
25 current deadlines in this case, including but not limited to deadlines for filing responsive  
26 pleadings, discovery deadlines, and any scheduled hearings.
- 27
- 28

6. **Proposed Order:** A proposed order granting this motion is attached hereto as Exhibit A for the Court's convenience.


WHEREFORE, Defendant JACOBS respectfully requests that this Court grant his motion and extends all deadlines by thirty (30) days to allow the Defendants' counsel adequate time to recover and prepare.

Respectfully submitted this January 21st, 2025.

**Defendant, acting In Pro Per**

By: <sup>W</sup>\_\_\_\_\_  
**LORING JACOBS, individually**

CERTIFICATE OF SERVICE I hereby certify that a true and correct copy of the foregoing motion was served on all counsel of record via the Court's CM/ECF system on January 21st, 2025

By: \_\_\_\_\_  
**LORING JACOBS, Individually**